

MICHAELA HOLT, a minor child,
by and through her natural mother and
next friend, Freda Holt,

V.

JUDGE _____

TARGET CORPORATION, a for-profit)
foreign corporation, and YALE REALTY)
SERVICES CORP, a foreign for-profit)
corporation,)

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pleadings, and orders served upon Defendant Target in this matter are attached hereto as Collective **Exhibit 1**.

2. Collective **Exhibit 1** attached hereto includes the only documents filed in this case. No further proceedings have been filed in the action pending in the Circuit Court of Rutherford County, Tennessee.

3. Defendant Target was served with the Summons and Complaint on August 27, 2020. *See Exhibit 1. See id.*

4. The Plaintiff seeks damages for personal injuries which Plaintiff alleges was caused by the negligence of the Defendant. The ad damnum set forth in the Plaintiff's Complaint seeks an amount "not to exceed \$1,000,000.00".

5. Under 28 U.S.C. § 1441(a), actions over which the district courts of the United States have original jurisdiction are proper for removal. This Court has original jurisdiction over this case under 28 U.S.C. § 1332(a)(1). This action is removable to this Court because this is a civil action, the Plaintiff and the Defendants are citizens of different states within the meaning of 28 U.S.C. § 1332, and the amount in controversy exceeds Seventy-Five Thousand Dollars and 00/100 (\$75,000.00), exclusive of interest and costs. The Plaintiff is a citizen resident of Tennessee. The Defendant, Target Corporation, is a Minnesota Corporation with its principal offices located in Minnesota. The Defendant, Yates Realty Services Corp., is a New York Corporation with its principal offices located in New York.

6. Based upon the foregoing, this Court has original jurisdiction over the above entitled action pursuant to 28 U.S.C. § 1332. Because the Plaintiff and the Defendants are citizens of different states and the amount in controversy exceeds \$75,000.00, exclusive of

interest and costs, removal of this action is proper pursuant to 28 U.S.C. § 1441(a) under the procedures set forth in 28 U.S.C. § 1446.

7. This Notice of Removal is filed with the Clerk of the United States District Court for the Middle District of Tennessee, Nashville Division, within thirty (30) days, as computed by Fed. R. Civ. P. 6(a), of service of process upon Defendant, Target Corporation.

8. A copy of this Notice of Removal and Collective **Exhibit 1** attached hereto has been filed with the Circuit Court Clerk for the Circuit Court of Rutherford County, Tennessee. Further, a notice of this filing along with a copy of this Notice of Removal and Collective **Exhibit 1** has been served on the Plaintiff by and through their counsel.

WHEREFORE, based upon the foregoing, Defendant, Target Corporation, hereby serves notice that the above-captioned action pending against Defendants in the Circuit Court of Rutherford County, Tennessee has been removed therefrom to this Court.

Respectfully submitted,

THOMAS TUCKER LAW

By: s/Thomas W. Tucker III
THOMAS W. TUCKER III, #22319
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing has been Mr. Tim L. Bowden, **LAW OFFICES OF TIM BOWDEN**, 306 Northcreek Boulevard, Suite 200, Goodlettsville, Tennessee 37072 and to Yale Realty Services Corp, 10 New King Street Suite 102, White Plains, New York, 10604, on this 24th day of September, 2020.

s/Thomas W. Tucker III
THOMAS W. TUCKER III